

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

WASSERMAN, JURISTA & STOLZ, P.C.

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DONALD W. CLARKE

In Re:

Case No. 14-29229-CMG

MUNIRE FURNITURE COMPANY, INC.

Hon. Christine M. Gravelle

Debtor.

Hearing Date: January 20, 2015 at 10:00am.

**NOTICE OF MOTION FOR THE ENTRY OF AN ORDER COMPELLING THE
DEBTOR AND HERITAGE TO COMPLY WITH THE PROVISIONS OF THE
CENTENNIAL LEASE AGREEMENT, ESTABLISHING AN ADMINISTRATIVE
PRIORITY LIEN ON THE SALE PROCEEDS
AND SHORTENING THE TIME FOR ASSUMPTION OR REJECTION,
OR, ALTERNATIVELY FOR STAY RELIEF**

TO:

SHINING J. HSU, Esq.
OFFICE OF THE U.S. TRUSTEE,
U.S. DEPARTMENT OF JUSTICE
ONE NEWARK CENTER, Ste 2100,
NEWARK, NEW JERSEY 07102

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PLEASE TAKE NOTICE that on January 20, 2015 at 10:00 a.m., the undersigned as attorneys for Douglas Friedrich, Robert K. Brown and James R. Weill, Successor Co-Trustees Under Trust Indenture Dated the 25th Day of June, 1968, d/b/a Centennial Industrial Park (“Centennial”), will move before the Honorable Christine M. Gravelle, United States Bankruptcy Judge, United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, for an Order consistent with the proposed relief requested within, and for such other and further relief as is just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, must be filed with the Clerk of the United States Bankruptcy Court, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608 and served upon Wasserman, Jurista & Stolz, P.C., Attn: Donald W. Clarke, Esq., 225 Millburn Avenue, Suite 207, P.O. Box 1029, Millburn, New Jersey 07041 so they are received in accordance with the Rules.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

WASSERMAN, JURISTA & STOLZ, P.C.
Counsel to Centennial Industrial Park

/s/Donald W. Clarke

By: _____

Dated: December 30, 2014

DONALD W. CLARKE